

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE	*	CASE NO. 11-07162-BKT
	*	
MILAGROS FONSECA SOLA	*	
	*	CHAPTER 13
<u>DEBTOR</u>	*	

DEBTOR'S MOTION IN COMPLIANCE WITH ORDER
DATED MARCH 13, 2015 DOCKET #76
RE: CURING OF PLAN PAYMENTS ARREARS

TO THE HONORABLE COURT:

NOW COMES, MILAGROS FONSECA SOLA, debtor, through the undersigned attorney, and very respectfully states and prays as follows:

1. On March 13, 2015, the Court issued the following *Order*:

"ORDER ON ARREARS:

This case is before the Court on debtor's(s') opposition to the motion to dismiss filed by the Trustee alleging that debtor(s) has/have failed to comply with the confirmed Chapter 13 Plan (docket entry #73, 75). Debtor(s) request(s) time to cure the arrears.

Debtor(s) is (are) hereby granted thirty (30) days from notice of this order to file evidence of being current. If the arrears are timely cured, the motion to dismiss shall be deemed denied. However, upon debtor's(s') failure to file evidence of being current, an order dismissing the case will be entered without further notice or hearing. Order due by 4/13/15" *Order on Arrears*, dated March 13, 2015, docket #76.

2. The debtor respectfully submits that she has cured any and all arrears in her confirmed Plan payments to the Trustee. On March 16, 2015, she made one (1) \$280.00 payment to the Trustee. Attached is evidence of the payment made to the Trustee on March 17, 2015.

3. The debtor respectfully submits that she is up-to-date in the confirmed Plan

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payments, thus, respectfully requests the Court to take note of said Plan payments and deny the Trustee's motion to dismiss, docket #73, in the above captioned case.

WHEREFORE, debtor, through the undersigned attorney respectfully requests that this Honorable Court grant the foregoing motion in compliance with *Order on Arrears* dated March 13, 2015, docket #76, in the above case.

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF filing system which will send sent notice of same to: the Chapter 13 Trustee; I also certify that a copy of this motion was sent via US Mail to debtor Milagros Fonseca Sola, Condado Moderno R 12 Calle 15 Caguas, PR 00725.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 18th day of March, 2015.

/s/ Roberto Figueroa Carrasquillo
ROBERTO FIGUEROA CARRASQUILLO
USDC #203614
ATTORNEY FOR PETITIONERS
PO BOX 186 CAGUAS PR 00726
TEL NO 787-744-7699 FAX 787-746-5294
Email: rfigueroa@rfclawpr.com

MoneyGram INTERNATIONAL MONEY ORDER

To Validate: Touch the stop sign, then watch it fade and reappear

STOP

Payable To: Jose B. Carrion, CH13

Payable To: Milagros Fonseca Sola

PURCHASER SIGNER FOR DRAWER / COMPRADOR FIRMA DEL LIBRADOR

ADDRESS / DIRECCION: PO BOX 88109 Chicago IL

Payable Through: BOKF, NA

ISSUER/DRAWER: MONEYGRAM PAYMENT SYSTEMS, INC.

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